

## EXHIBIT #16

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

LARRY L. STULER, )  
 )  
 Plaintiff, )  
 )  
 v. ) Civil Case No. 10-1342  
 )  
 INTERNAL REVENUE SERVICE, )  
 )  
 Defendant. )

## DECLARATION OF CHERYL JACKSON

I, Cheryl Jackson, pursuant to 28 U.S.C. 1746, declare as follows:

1. I am a Disclosure Assistant with the Philadelphia, Pennsylvania District Disclosure Office of the Internal Revenue Service.

2. I have been employed by the Internal Revenue Service since June 1985 and have been a Disclosure Assistant since January 2002.

3. As part of my official duties, I am responsible for the processing of individual requests for access to information made to this office pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. § 552. In November 2010 I was asked to complete the processing of plaintiff's FOIA request which is the subject of the above-captioned litigation.

4. I am familiar with the documents at issue in this lawsuit.

5. By letter dated August 14, 2010, plaintiff filed a FOIA request with the Philadelphia, Pennsylvania Disclosure Office 2 seeking copies of Complete Individual Master File (IMF) - Martinsburg Computer Center (MCC) transcripts and Specific IMF - MCC transcripts for himself for tax years 1994 through 2009.

6. On January 10, 2011, I sent the Complete IMF transcripts and the Specific IMF transcripts for plaintiff for tax years 1994 through 2009 to Ms. Elizabeth McBrearty of the Office of Chief Counsel of the Internal Revenue Service. It is my understanding that they forwarded the documents to the Tax Division of the U.S. Department of Justice.

7. To the best of my knowledge, all documents responsive to plaintiff's August 14, 2010 FOIA request have been provided.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 9th day of February, 2011.



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CHERYL JACKSON  
Internal Revenue Service  
Disclosure Office  
Philadelphia, PA